the manholes are required. In addition, in California, Pacific Bell will not accept applications from personnel at a CLEC whose names are not pre-designated on a list that the CLEC must maintain with Pacific Bell (a CO 4926 form). Finally, Qwest has encountered delays in having incumbent LECs assign manholes until the incumbent LEC is provided a detailed map of Qwest's local network – a map which is not necessary in order for the incumbent LECs to assign the manholes on their own network.

Two scenarios are prevalent in the identification and assignment of manholes:

- The incumbent LEC identifies all the possible manholes serving a central office; the CLEC selects the manholes they prefer and applies for them; the incumbent LEC researches those manholes and responds whether space is available;
- The incumbent LEC simply designates manholes in which space is known to be available.

Qwest's preference is for the incumbent LEC to determine the manholes in which space is available, and we will build our network to those manholes. Any other process that requires the exchange of manhole information, maps, and space availability only builds delay-time into the planning and construction process.

Beyond the assignment of manholes, Qwest has also encountered problems with the exchange of network-critical information related to those manholes on a timely basis. Qwest needs to know the identity of the manholes as well as the footage measurements from the manhole to the collocation space (including the footage to the vault, the riser and the actual collocation space), so that Qwest can

leave sufficient fiber in the manhole to reach its collocation space. Any delays in receiving this information can jeopardize a network construction project. The Commission should require the incumbent LECs to establish clearly defined processes and intervals for providing this information in writing to the CLEC. Our experience has been that the processes are not uniform, or where there are processes defined, they are not being followed.

Finally, on a related note, Qwest has also had problems with having the fiber–pull from the manhole to the cage completed on a timely basis. This is a critical piece of the puzzle—if there are established intervals for delivery of the collocation space, and established intervals for access to the manholes, but no defined process or interval to have the fiber pulled from the manhole to the collocation space, then equipment could be installed for months but not be able to be put into service due to the incumbent LEC's failure to schedule and pull the fiber on a timely basis. Qwest has encountered intervals as short as 10 days and as long as 80 to have fiber pulled to its collocation space.

To solve the above problems, the Commission should instruct the incumbent LECs to establish uniform processes for managing the application for and assignment of manholes required for collocation, with defined intervals for the exchange of network information. In addition, the Commission should require the incumbent LECs to continue to include the conduit access/ROW provisions in their interconnection agreements, and should prohibit the imposition of unnecessary administrative "pre-requisites" to the acceptance of manhole application (such as

Pacific Bell's requirement that all personnel submitting applications be pre-registered with them on a CO 4926 form). Finally, the Commission should require the incumbent LECs to establish and publish defined processes and intervals for pulling fiber to a collocation cage; where the CLEC can have the fiber in the manhole by a specified deadline, the timeframe for pulling the fiber should be included in the collocation interval itself. However, where the fiber arrives in the manhole after a designated timeframe, the incumbent LEC should have a defined interval, such as 10 days, to have the fiber pulled.

H. Selection of the Actual Physical Collocation Space

In the *Second Further Notice*, the Commission sought comment on whether the incumbent, as opposed to the requesting carrier, should select a requesting carrier's physical collocation space from among the unused space in the incumbent's premises.[24] We submit that the incumbent LEC should determine the placement of collocation in the central office for several reasons. First, the incumbent LEC is the owner of the central office, and is responsible for the provision of telephony as the provider of last resort. Only the incumbent LEC can plan the appropriate overall functional use of the central office over the expected life of the building. The incumbent LEC is responsible for the common systems of power and HVAC for the central office and is responsible for the functioning of the central office in the event of an emergency or disaster. For all of the above reasons, the incumbent LEC should make the determination on placement of collocation in the central office.

---

[24] *Second Further Notice* at ¶ 96.

Furthermore, the Commission need not (and should not) promulgate additional rules or establish criteria by which the incumbent LEC must select collocation space. Section 251(c)(6) already provides that the incumbent LEC must provide collocation on "just, reasonable, and non-discriminatory" terms. If the incumbent LEC, for example, intentionally placed a requesting carrier in a collocation space that is difficult to use or isolated when more suitable space is available, such a practice could violate section 251(c)(6) as a failure to provide collocation on just and reasonable terms, unless the incumbent LEC can provide a legitimate business reason for doing so. In short, incumbent LECs must act reasonably under the Act, and additional rules are unnecessary.

The Commission also sought comment concerning the circumstances in which the placement of collocators in a room or isolated space separate from the incumbent's own equipment would violate the Act, as well as how such placement would otherwise affect the cost of obtaining collocation.[25] Qwest allows collocation where space is available on a first-come, first-served basis. Moreover, whenever possible, Qwest places all collocation areas within its central offices (rather than in adjacent areas). If, however, no space is available in the central office, Qwest might be forced to place collocation areas on separate floors or in adjacent areas. . The length of time and the cost of conditioning this space would depend on several factors such as: power availability, HVAC availability, racking availability, and conduit availability. This scenario would also apply to space availability in remote

[25] *Second Further Notice* at ¶ 96-97.

among other measures, in the *Collocation Provisioning Order*.[7] The *Order* purports to continue the Act's primary reliance on carriers and state commissions to establish the particular terms of interconnection agreements. Accordingly, it imposes a 90-day maximum provisioning interval *only* where (a) a requesting party and incumbent LEC have failed to agree on an appropriate provisioning interval, or (b) a state has not set its own provisioning interval.[8]

Where a collocation provisioning interval will be implemented through a new or amended interconnection agreement, the effect of the Commission's default rule is relatively straightforward: It will apply failing the adoption of a different interval through the negotiation or arbitration processes described in section 252.[9] Where an SGAT or tariff is involved, however, implementation of this rule is less clear. Paragraph 36 of the *Order* addresses these circumstances:

> In some instances, a state tariff sets forth the rates, terms, and conditions under which an incumbent LEC provides physical collocation to requesting carriers. An incumbent LEC also may have filed with the state commission a statement of generally available terms and conditions (SGAT) under which it offers to provide physical collocation to requesting carriers. Because of the critical importance of timely collocation provisioning, we conclude that, within 30 days after the effective date of this Order, the incumbent LEC must file with the state commission any amendments necessary to bring a tariff or SGAT into compliance with the national standards. At the time it files these amendments, the incumbent must also file its request, if any, that the state set intervals longer than the national standards as well as all supporting information. For a SGAT, the national standards shall take effect within 60 days after the amendment's filing except to the extent the state commission specifies other application processing or provisioning intervals for a particular type of collocation arrangements, such as cageless collocation. Where a tariff must be amended to reflect the national standards, those standards shall take effect at the earliest time permissible under applicable state requirements.[10]

---

[7] *See Collocation Provisioning Order* ¶¶ 14-69.

[8] *See id.* ¶ 22.

[9] *See id.* ¶¶ 33-35.

[10] *Id.* ¶ 36.

The need for clarification arises from the fact that amendments to an SGAT become effective within 60 days of the incumbent LEC's submission *regardless* of whether the state commission has completed its review of the amendment. *See* 47 U.S.C. § 252(f)(3). Notwithstanding this statutory provision, the *Order* arguably could be read to require an *affirmative ruling* by a state commission before an SGAT that contains some provisioning interval other than the Commission's 90-day default interval becomes effective.[11]

ARGUMENT

I. THE COMMISSION SHOULD CLARIFY THAT AN INCUMBENT LEC MAY RELY ON THE PROVISIONING INTERVAL SPECIFIED IN AN AMENDED SGAT REGARDLESS OF WHETHER A STATE COMMISSION AFFIRMATIVELY APPROVES THE AMENDMENT OR INSTEAD ALLOWS IT TO TAKE EFFECT BY OPERATION OF LAW.

As the Commission has recognized, while a 90-day provisioning interval for collocation space may be appropriate in some situations, circumstances inevitably will exist in which a longer interval is necessary.[12] For example, "conditioning space in a premises [may be] particularly difficult,"[13] and forecasts of demand by CLECs may be inadequate for the incumbent to plan for the necessary construction.[14] As a general matter, the *Order* appropriately recognizes the need to rely on the negotiation and arbitration processes established in section 252 of the Act to tailor provisioning intervals to particular circumstances.[15]

---

[11] *See id.* ("national standards shall take effect within 60 days after the amendment's filing except to the extent the state commission *specifies* other application or provisioning intervals for a particular type of collocation arrangement, such as cageless collocation") (emphasis added). Similarly, where a tariff amendment that proposes an interval longer than 90 days takes effect without affirmative action by a state commission, it is unclear whether the Commission would require the incumbent LEC subject to the default 90-day rule.

[12] *See, e.g., id.* ¶ 22.

[13] *Id.*

[14] *See id.* ¶ 16 (citing comments of Bell Atlantic at 10-11).

[15] *See id.* ¶ 22; *see also id.* ¶ 37 ("States will continue to have flexibility to adopt different intervals and additional collocation requirements, consistent with the Act.").

With respect to tailoring intervals through the SGAT process, however, the *Order* is ambiguous. On the one hand, the Commission has acknowledged that incumbents' amendments to their SGATs may include "intervals *longer* than the national standards," provided the incumbent provides supporting information.[16] Read in light of section 252(f)(3) of the Act, this acknowledgment should mean that, where (a) an incumbent has a good-faith basis for establishing a provisioning interval of longer than 90 days, (b) the incumbent includes such an interval within its amended SGAT and provides supporting information, and (c) the relevant state commission approves the amended SGAT by failing to take any contrary action within 60 days of the submission, the incumbent may rely on the longer provisioning interval.[17] On the other hand, the *Order* includes some language that could be read to provide that a longer provisioning interval will be effective only if a state commission makes an *affirmative* ruling to that effect.[18]

The Commission should clarify that the former reading is the correct one. Applying the default 90-day interval after a state commission has declined to reject an amended SGAT would be inconsistent with section 252(f)(3), as well as with the Act's primary reliance on carriers and state commissions to establish specific interconnection provisions.[19] Such an interpretation also would be inconsistent with the general recognition in the *Order* that the national default will

[16] *See id.* ¶ 36 (emphasis added).

[17] *See* 47 U.S.C. § 252(f)(3)(B). By this filing, Qwest does not suggest that a state order extending the provisioning interval for reasons other than forecasting deficiencies or construction requirements would be reasonable.

[18] *Collocation Provisioning Order* ¶ 36 ("national standards shall take effect within 60 days after the amendment's filing except to the extent the state commission *specifies* other application or provisioning intervals for a particular type of collocation arrangement, such as cageless collocation") (emphasis added).

[19] *See generally* 47 U.S.C. § 252.

apply *only* "when the state does *not* set its own standards."[20] A state may "set" standards by declining to take action with respect to an SGAT, just as it can by issuing an affirmative ruling.

Moreover, as explained more fully in the following section, requiring compliance with the 90-day default interval when an incumbent LEC has documented its inability to comply with that deadline — simply because the state commission chose not to rule affirmatively on an amended SGAT, or lacked sufficient time to act — would unfairly penalize incumbents. Qwest has now filed SGATs in 11 of the 14 states in which it provides service as an incumbent LEC. All of these SGATs contain collocation provisions, and all have been the subject of extensive debate and revision at the Section 271 workshops in which Qwest has been participating over the last year. By the November 9 deadline, Qwest plans to have filed SGAT amendments in these 11 states and original SGATs in the remaining three states. These revised and new SGATs all will contain detailed language dealing with collocation issues, including documentation of the manner in which collocation requests that cannot be fulfilled within 90 days should be handled. While Qwest intends to prosecute these SGAT filings vigorously, and will work to secure affirmative state approvals of the amended collocation language under Section 252(f)(3)(A) within 60 days of filing, Qwest cannot assure that all such approvals will be obtained within that time frame. It would be unreasonable to make the availability of an exception to the 90-day provisioning interval — for which the need is fully documented — hinge on circumstances entirely beyond the incumbent LEC's control.

II. IN THE ALTERNATIVE, THE COMMISSION SHOULD RECONSIDER THE IMPOSITION OF THE 90-DAY DEFAULT RULE IN CIRCUMSTANCES WHERE A STATE COMMISSION HAS DECLINED TO RULE ON AN AMENDED SGAT WITHIN 60 DAYS.

[20] *Collocation Provisioning Order* ¶ 22 (emphasis added).

If the Commission denies Qwest's request for clarification and determines that the *Order* intended to impose the 90-day default provisioning interval in the absence of an affirmative ruling on an SGAT amendment, Qwest requests reconsideration of that aspect of the *Order*.

As discussed above, section 252(f)(3) makes an incumbent's SGAT effective after 60 days, regardless of whether the state commission has issued an affirmative ruling or instead simply let the SGAT take effect automatically.[21] Therefore, treating an amended SGAT as *ineffective* in the absence of an affirmative ruling would be inconsistent with the statute. In addition, section 252's establishment of negotiation and arbitration processes precludes the Commission from imposing any interconnection obligation as an absolute requirement.[22] But if the *Order* imposed the 90-day provisioning interval irrespective of an incumbent's submission of an SGAT documenting the need for an alternative interval, it would render the negotiation and arbitration processes moot. Reading the *Order* to allow an incumbent to adhere to a longer provisioning schedule after filing an adequately supported SGAT therefore is necessary under section 252.

Moreover, if the *Order* were read to assert that a 90-day provisioning interval *invariably* can be met, there is no support in the record for such an assertion. As the attached declaration of Georganne Weidenbach demonstrates, Qwest's ability to provision collocation space within 90 days depends on accurate demand forecasts and is dramatically affected when a CLEC request necessitates extensive conditioning of space or construction of an adjacent vault.

---

[21] *See* 47 U.S.C. 252(f)(3).

[22] *See id.* §§ 252(a), (b).

The statement in the *Order* that the default 90-day interval "exceeds the interval U S WEST [now Qwest] has committed itself to achieve for cageless physical collocation"[23] is based on an incorrect understanding of Qwest's internal policy. Qwest has entered into *some* agreements with CLECs that commit Qwest to provision space within 45 or 90 days, because those agreements also require CLECs to provide Qwest with long-term forecasts of demand. Such forecasting requirements are critical to Qwest's willingness to commit to short provisioning intervals. Absent such forecasts, Qwest cannot make advance preparations for provisioning collocation space and therefore cannot ensure compliance with a 90-day provisioning commitment. Thus, an absolute requirement to provision collocation space within 90 days — which the *Order* would impose if not read as Qwest suggests in section I above — cannot be based on the assertion that Qwest already has adopted such a requirement for itself.

Finally, if the Commission interprets the *Order* as imposing a requirement to comply with the 90-day default interval even where an incumbent has already filed an SGAT justifying a longer interval, the Commission should create exceptions for situations where CLECs have not sufficiently forecast demand, or where extensive space reconditioning or construction of adjacent vaults are required. As the attached declaration of Georganne Weidenbach demonstrates, Qwest cannot comply with a 90-day deadline in such circumstances. It would be patently unreasonable for the Commission to penalize an incumbent LEC for failing to comply with the 90-day provisioning interval when the LEC (a) has taken all steps within its power to have an amended SGAT approved by the state commission, and (b) cannot possibly meet a CLEC's requirements within 90 days because of extensive construction requirements or other factors that it could not reasonably anticipate.

[23] *Collocation Provisioning Order* ¶ 27.

CONCLUSION

For the foregoing reasons, the Commission should clarify the Order by stating that an incumbent LEC that has filed an adequately documented SGAT amendment that includes a provisioning interval longer than 90 days may comply with that interval if the state commission declines to issue any ruling within 60 days of the filing of the amendment. In the alternative, the Commission should reconsider the decision to apply the 90-day interval in this circumstance.

Respectfully submitted,

Robert B. McKenna
QWEST CORPORATION
1801 California Street, Ste. 5100
Denver, CO 80202
(303) 672-2861

William T. Lake
Matthew A. Brill
WILMER, CUTLER & PICKERING
2445 M Street, N.W.
Washington, D.C. 20037
(202) 663-6000

Counsel for Qwest Corporation

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matters of	)	
	)	
Deployment of Wireline Services Offering Advanced Telecommunications Capability	)	CC Docket No. 98-147
	)	
and	)	
	)	
Implementation of the Local Competition Provisions of the Telecommunications Act of 1996	)	CC Docket No. 96-98

Declaration of Georganne Weidenbach

1. My name is Georganne Weidenbach. I am employed by Qwest Communications International as a Network Planner, Strategist and Negotiator in the Technical Regulatory Interconnection Planning group. From 1996 to 1998, I served as the Lead Project Manager for Collocation and Interconnection for U S WEST, Inc., before the merger of Qwest and U S WEST.

2. I have held numerous positions with Qwest and U S WEST, including managing the Design Services installation and repair dispatch center for the Local Network Organization. I have extensive Marketing, Public Policy and Engineering background, including the development of written methods and procedures for Design Services and Collocation applications.

3. I hold a Bachelor of Science degree in business from Regis University at Denver.

4. I have reviewed the FCC's recent Collocation Order, and believe that the Order is deficient in three important respects:

1) **Forecasting** — The Order fails to require CLECs to provide, or to permit ILECs to require CLECs to provide, timely and accurate forecasts of their collocation requirements. It instead leaves the issue of forecasting to each individual state. Forecasts are absolutely crucial in orderly administration of collocation provisioning.

2) **Adjacent Collocation** — The Order, in rule §51.323(l), establishes a 90-day interval for Adjacent Collocation. Such a requirement is not supported by record evidence or the text of the Order, nor is a 90-day interval a reasonable requirement, given the work required.

3) **Reconditioning of Space** — The Order requires incumbent LECs to complete the reconditioning of space as a part of the 90 day interval. This is an unreasonable requirement, given the amount of work required to recondition space, particularly since the FCC has not required CLECs to provide a forecast of their collocation requirements.

I will address each of the above issues in the following sections of this affidavit.

5. **Forecasting.** To achieve the 90-day intervals established in the Order for caged or cageless physical collocation, it is critical that incumbent LECs obtain accurate and timely forecasts from CLECs. Such forecasts are required to determine if sufficient space is available, and to pre-provision such infrastructure as power, air conditioning, lighting, and to recondition office space or remove unused, obsolete equipment if required. Such pre-provisioning is necessary, since such infrastructure cannot be completed within the 90-day interval between the receipt of an application by a CLEC and the turnover of space by Qwest.

6. For example, Qwest has approximately 1,400 central office locations, but more than two-thirds of these central offices have no collocation. Without forecasts, Qwest cannot reasonably be expected to predict when and if a request for collocation will arrive at one of the more than 900 central offices where no collocation has yet been requested. Nor can Qwest be expected to accurately predict the specific power, space,

and air conditioning needs for the collocation request of such a future CLEC application. As a result, it is unreasonable to require Qwest to pre-provision the space, power, air-conditioning, and other infrastructure in these locations for the possible arrival of a collocator at some point in time in the future.

7. Forecasts are also an important tool in the hiring, training, and deployment of work force engaged in the various stages of collocation – including feasibility studies, quotation development, and construction.

8. **Adjacent Collocation.** Adjacent collocation is required when space for physical collocation has been exhausted at a particular premise. In the context of an exhausted central office building, it is unreasonable to expect the construction of an adjacent structure (such as a building addition, controlled environmental vault, or other structure) within the 90-day interval. Because the Order grants CLECs the right to construct the adjacent structure, a typical process will involve first determining the amount of space required by the CLEC, a review of the plans for the site, including future construction plans, parking requirements, hoisting areas, existing cable vaults and cable runs. Once a general design has been established, a more detailed design must be prepared, and often bids will be required from multiple general contractors. Building permits may also be required from the local governmental agency. Actual construction of the adjacent structure, once permits have been obtained and a contractor is selected will also often require several months for excavation, drainage, construction of the structure, and the supporting infrastructure (power, lighting, etc.). Completion of all of this work, as well as the work required to permit the incumbent LEC to terminate the associated DC Power, and tie cables to the network, cannot generally be completed in a 90-day interval.

This is particularly unreasonable, as the FCC has granted to the CLEC the right to complete the majority of this work for adjacent collocation.

9. **Reconditioning of Space.** Reconditioning of space is required when a central office building has exhausted space, but the same central office has available administrative space that may be converted to central office space. Such conversion of administrative space to central office space is referred to as reconditioning space. A typical administrative space contains carpeted floors, desks, suspended ceilings, and associated lighting fixtures. Conversion of this space typically involves the hiring of an architect, who prepares drawings and detailed specifications, for the removal of the carpeting, ceiling, lighting fixtures, etc. as well as the construction of the new floor, the installation of new lighting fixtures, the installation of new electrical outlets, and the construction of new air conditioning venting (and cooling capacity, if required).

10. Once the specifications are completed, the drawings and specifications are submitted to general contractors through a request for bids, depending on the size of the job. Once the contractor is selected, the construction can begin.

11. All of the above generally require substantially more than 90 days for completion.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed this ___ day of October, 2000.

Georganne Weidenbach

Federal Communications Commission

The FCC Acknowledges Receipt of Comments From ...

Qwest Corporation

...and Thank You for Your Comments

Your Confirmation Number is: '20001010036777 ' 1		
Date Received: Oct 10 2000		
Docket: 98-147		
Number of Files Transmitted: 1		
File Name	**File Type**	**File Size (bytes)**
PETITION FOR RECONSIDERATION	Microsoft Word	53761

Initiate a Submission | Search ECFS | Return to ECFS Home Page

FCC Home Page | Search | Commissioners | Bureaus/Offices | Finding Info

updated 07/07/00

CERTIFICATE OF SERVICE

I, Ross Dino, do hereby certify that I have caused 1) the foregoing **COMMENTS OF QWEST COMMUNICATIONS INTERNATIONAL INC.** to be filed electronically with the FCC by using its Electronic Comment Filing System, 2) a paper and diskette copy of the **COMMENTS** to be served, via hand delivery, upon the entity listed on the attached service list (marked with a number sign), and 3) a courtesy paper copy of the **COMMENTS** to be served, via hand delivery, upon all other persons listed on the attached service list.

Ross Dino
Ross Dino

October 12, 2000

William E. Kennard
Federal Communications Commission
8th Floor
Portals II
445 12th Street, S.W.
Washington, DC 20554

Gloria Tristani
Federal Communications Commission
8th Floor
Portals II
445 12th Street, S.W.
Washington, DC 20554

Michael K. Powell
Federal Communications Commission
8th Floor
Portals II
445 12th Street, S.W.
Washington, DC 20554

Harold Furchtgott-Roth
Federal Communications Commission
8th Floor
Portals II
445 12th Street, S.W.
Washington, DC 20554

Susan P. Ness
Federal Communications Commission
8th Floor
Portals II
445 12th Street, S.W.
Washington, DC 20554

Dorothy T. Attwood, Chief
Common Carrier Bureau
Federal Communications Commission
5th Floor
Portals II
445 12th Street, S.W.
Washington, DC 20554

Michelle Carey, Chief
Policy and Program Planning Division
Federal Communications Commission
Portals II
445 12th Street, S.W.
Washington, DC 20554

Kathy Farroba, Deputy Chief
Policy and Program Planning Division
Federal Communications Commission
Portals II
445 12th Street, S.W.
Washington, DC 20554

Janice Myles
Policy and Program Planning Division
Federal Communications Commission
Portals II
445 12th Street, S.W.
Washington, DC 20554

Glenn Reynolds, Deputy Chief
Common Carrier Bureau
Federal Communications Commission
5th Floor
Portals II
445 12th Street, S.W.
Washington, DC 20554

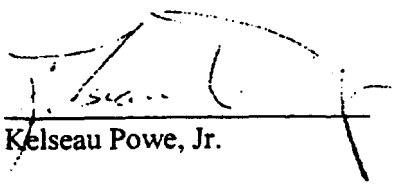
#International Transcription
Services, Inc.
1231 20th Street, N.W.
Washington, DC 20036

(including 3x5 inch diskette w/cover letter)

CC96-98tt-el.doc
Last Update: 10/12/2000

CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that I have caused the foregoing **COMMENTS OF QWEST COMMUNICATIONS INTERNATIONAL INC.** to be filed with the Secretary of the FCC, a copy to be hand served on the parties indicated with an asterik (*) and a copy to be served, via First Class United States mail, postage prepaid, on the remaining party listed on the attached service list.



Kelseau Powe, Jr.

April 23, 2001

*Janice Myles
Policy & Program Planning Division
Federal Communications Commission
Room 5-C327
Portals II
445 12th Street, S.W.
Washington, DC 20554

*International Transcription
Services, Inc.
1231 20th Street, N.W.
Washington, DC 20036

Andrew D. Lipman
Patrick J. Donovan
Swidler Berlin Shereff Friedman, LLP
Suite 300
3000 K Street, N.W.
Washington, DC 20007

CC01-77.doc
Updated 4/23/2001

CERTIFICATE OF SERVICE

I, Beverly L. Harper-Jones, hereby certify that on this 2nd day of July 2001, I served copies of the foregoing by hand-delivery upon the following:

Paula Silberthau
Office of General Counsel
Administrative Law Division
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Linda Kinney
Office of General Counsel
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

John Rogovin
Office Of General Counsel
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Brent Olson
Deputy Chief
Common Carrier Bureau
Policy & Program Planning Division
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Kimberly Cook
Common Carrier Bureau
Policy & Program Planning Division
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Sonja Rifken
Office of General Counsel
Administrative Law Division
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Debra Weiner
Assistant General Counsel
Office of General Counsel
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Beverly L. Harper-Jones